1 2 3 4	Robert J. Beles Bar No. 41993 Paul McCarthy Bar No. 139495 Manisha Daryani Bar No. 272992 One Kaiser Plaza, Suite 2300 Oakland, California 94612-3642 Tel No. (510) 836-0100 Fax. No. (510) 832-3690								
5	Attorneys for Petitioner VINCENT TURNER								
6									
7 8	Hnited States District Court Northern District of California San Francisco Division								
9	VINCENT TURNER,	No. 3:13-CV-05718-VC							
10 11 12 13 14 15	Petitioner, v. FRED FOULK, Warden, High Desert State Prison Respondent, PEOPLE OF THE STATE OF CALIFORNIA, Real Party in Interest.	MOTION AND DECLARATION OF GOOD CAUSE TO PERMIT LATE FILING OF TRAVERSE AND REPLY MEMORANDUM							
17	MOTION AND DECLARATION OF GOOD CAUSE TO PERMIT LATE FILING OF TRAVERSE AND REPLY MEMORANDUM								
18 19	I, Manisha Daryani, declare under penalty of perjury as follows:								
20	1. On December 10, 2013, petitioner filed a petition for writ of habeas corpus.								
21	Respondent filed its brief on June 5, 2014.								
22	2. Petitioner requested and received three extensions of time to file the traverse and reply								
23	memorandum for a total of 97 days. The traverse and reply memorandum were due on Friday,								
24	October 10, 2014.								
25	3. I was able to finish the reply mem	orandum on that date, but after 5:00 p.m. When							
	I attempted to e-file the documents, I learned that ECF was down for maintenance until noon								
2627	today, Monday, October 13, 2014.								

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4.	On behalf	of petitioner,	I request	leave to	file the	traverse	and reply	memorai	ndum
three days	s late.								

5. Petitioner is not on bail and is serving a sentence of 48 years to life in state prison. Accordingly, respondent will not be prejudiced by the reply brief being filed three days late.

I declare under penalty of perjury that the facts set forth in this motion are true and correct. Executed in Oakland, California, on Monday, October 13, 2014.

Date: October 14, 2014

/s/ Manisha Daryani



Motion and Declaration of Good Cause to Permit Late Filing of Traverse and Reply Memorandum